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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

MARK STOYAS and NEW ENGLAND TEAMSTERS & TRUCKING INDUSTRY PENSION FUND,

Plaintiffs,

and

AUTOMOTIVE INDUSTRIES PENSION TRUST FUND, Individually and on Behalf of All Others Similarly Situated,

Lead Plaintiff,

vs.

TOSHIBA CORPORATION,

Defendant.

Case No. 2:15-cv-04194-DDP(JCx)

CLASS ACTION

JOINT STIPULATION MODIFYING THE CASE SCHEDULING ORDER

Lead Plaintiff Automotive Industries Pension Trust Fund ("AIPTF") and named Plaintiff New England Teamsters & Trucking Industry Pension Fund ("NETTIPF") (collectively "Plaintiffs") and Defendant Toshiba Corporation ("Toshiba" and, together with Plaintiffs, the "Parties") respectfully submit this Joint Stipulation Modifying the Case Scheduling Order. Beyond the express provisions herein, all Parties reserve all of their rights, claims, defenses, privileges and immunities.

WHEREAS, on August 8, 2019, Plaintiffs filed the Second Amended and Consolidated Class Action Complaint for Violation of the Securities Laws of the United States and Japan (ECF No. 75) ("Complaint"), bringing this action as a putative class action pursuant to Rule 23 of the Federal Rules of Civil Procedure;

WHEREAS, on January 28, 2020, the Court denied Toshiba's motion to dismiss the Complaint (ECF No. 88), which lifted the discovery stay in this action imposed by 15 U.S.C. §78u-4(b)(3)(B) of the Private Securities Litigation Reform Act of 1995;

WHEREAS, on March 13, 2020, the Court entered a Scheduling Order in this action (ECF No. 97), which provides that "the parties are hereby granted leave of the court to adjust the trial date, and other related dates, by up to eight months, provided all parties agree to such adjustments and submit a stipulation in that regard";

WHEREAS, Plaintiffs served Toshiba with requests for production on March 4, 2020 and September 17, 2020, pursuant to which Toshiba has produced approximately 20,000 documents and represents that its production is substantially complete as of June 18, 2021;

WHEREAS, Plaintiffs have served several third-party subpoenas, including: (a) a subpoena to the U.S. Securities and Exchange Commission, which Plaintiffs had been unable to serve until October 30, 2020 as a result of the health crisis; and (b) a subpoena to Ernst & Young LLP, pursuant to which Ernst & Young LLP was

unable to produce documents until March 30, 2021 as its Manhattan offices were closed as a result of COVID-19;

WHEREAS, Plaintiffs need to review the discovery produced and take depositions in this action prior to trial; and

WHEREAS, given the remaining documents to be produced and reviewed, and the need to schedule depositions following the completion of document production, Plaintiffs believe that an extension of the existing deadlines is necessary and Toshiba consents to the extension;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and this Court's March 13, 2020 Scheduling Order, and subject to the approval of the Court, that:

1. Good cause exists for modifying the scheduling order; and

2. The remaining case schedule, including trial, shall be extended as follows:

ACTION	CURRENT DATE	PROPOSED DATE
Fact discovery cutoff	September 23, 2021	March 25, 2022
Deadline for opening expert reports	October 21, 2021	April 22, 2022
Deadline for rebuttal expert reports	November 18, 2021	May 20, 2022
Expert discovery cutoff	January 19, 2022	June 24, 2022
Deadline to file dispositive motion(s)	February 17, 2022	August 25, 2022
Opposition(s) to dispositive motion(s)	April 6, 2022	October 6, 2022
Reply(ies) in support of dispositive motion(s)	May 12, 2022	November 17, 2022
Final pretrial conference	September 12, 2022 11:00 a.m.	February 13, 2023 11:00 a.m.

ACTION	CURRENT DATE	PROPOSED DATE
Trial	September 27, 2022 9:00 a.m.	March 14, 2023 9:00 a.m.

DATED: June 24, 2021

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CERTIFICATE PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)

I, Willow E. Radcliffe, am the ECF User whose ID and password are being used to file this Joint Stipulation Modifying the Case Scheduling Order. In compliance with Civil L.R. 5-4.3.4(a)(2)(i), I hereby attest that Bryan A. Merryman has concurred in this filing.

s/ Willow E. Radcliffe
WILLOW E. RADCLIFFE

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on June 24, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Willow E. Radcliffe
WILLOW E. RADCLIFFE

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Mailing Information for a Case 2:15-cv-04194-DDP-JC Mark Stoyas v. Toshiba Corporation et al

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)